

10 APR 14 AM 10:02
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

1 **Todd M. Friedman (216752)**
2 **Law Offices of Todd M. Friedman, P.C.**
3 **369 S. Doheny Dr. #415**
4 **Beverly Hills, CA 90211**
5 **Phone: 877 206-4741**
6 **Fax: 866 633-0228**
7 **tfriedman@attorneysforconsumers.com**
8 **Attorney for Plaintiff**

9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 **NIKKI GIAVASIS,**

13 Plaintiff,

14 vs.

15 **KIMBALL TIREY & ST. JOHN**
16 **LLC,**

17 Defendant.
18

19) Case No. **CV 10-02693**
20)
21) **COMPLAINT FOR VIOLATION**
22) **OF FEDERAL FAIR DEBT**
23) **COLLECTION PRACTICES ACT,**
24) **ROSENTHAL FAIR DEBT**
25) **COLLECTION PRACTICES ACT,**
26) **AND INVASION OF PRIVACY**
27)
28)

R (Ex)

19
20 **I. INTRODUCTION**

21 1. This is an action for damages brought by an individual consumer for
22 Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. §
23 1692, *et seq.* (hereinafter "FDCPA"), and the Rosenthal Fair Debt Collection
24 Practices Act, Cal Civ Code § 1788, *et seq.* (hereinafter "RFDCPA"), both of
25 which prohibit debt collectors from engaging in abusive, deceptive, and unfair
26 practices. Ancillary to the claims above, Plaintiff further alleges claims for
27
28

1 invasion of privacy arising from intrusion upon seclusion and public disclosure of
2 private facts.
3

4 II. JURISDICTION

5 2. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d).
6

7 III. PARTIES

8 3. Plaintiff, NIKKI GIAVASIS ("Plaintiff"), is a natural person
9 residing in Los Angeles county in the state of California, and is a "consumer" as
10 defined by the FDCPA, 15 U.S.C. § 1692a(3) and is a "debtor" as defined by Cal
11 Civ Code 1788.2(h).
12

13
14 4. At all relevant times herein, Defendant, KIMBALL TIREY & ST.
15 JOHN LLC , ("Defendant") was a company engaged, by use of the mails and
16 telephone, in the business of collecting a debt from Plaintiff which qualifies as a
17 "debt," as defined by 15 U.S.C. §1692a(5), and a "consumer debt," as defined by
18 Cal Civ Code § 1788.2(f). Defendant regularly attempts to collect debts alleged
19 to be due another, and therefore is a "debt collector" as defined by the FDCPA,
20 15 U.S.C. § 1692a(6), and RFDCPA, Cal Civ Code § 1788.2(c).
21
22

23 IV. FACTUAL ALLEGATIONS

24
25 5. At various and multiple times prior to the filing of the instant
26 complaint, including within the one year preceding the filing of this complaint,
27 Defendant contacted Plaintiff in an attempt to collect an alleged outstanding debt.
28

1 Defendant's conduct violated the FDCPA and the RFDCPA in multiple ways,
2 including but not limited to:
3

- 4 1) Communicating, or threatening to communicate to a third
5 party the fact that Plaintiff has engaged in conduct, other
6 than the failure to pay a consumer debt, which Defendant
7 knew or had reason to know would defame the debtor (Cal
8 Civ Code §1788.10(c));
- 9 2) Falsely representing the character, amount, or legal status
10 of Plaintiff's debt (§1692e(2)(A)); Defendant has
11 attempted to collect on an alleged debt that has not been
12 established or proven and Defendant has inflated the
13 alleged debt improperly. On a debt was originally only
14 \$3400, Defendant has sought to collect nearly \$10,000.
15 Plaintiff contests that this debt exists because she paid it in
16 full under the terms of her original lease and Defendant
17 attempted to collect on it dispute Plaintiff's dispute;
- 18 3) In connection with collection of a debt, using obscene or
19 profane language directed at Plaintiff (§1692d(2));
- 20 4) In connection with collection of a debt, using language the
21 natural consequence of which was to abuse Plaintiff
22 (§1692d(2));
- 23 5) Using unfair or unconscionable means against Plaintiff in
24 connection with an attempt to collect a debt (§1692f);
- 25 6) Collecting an amount from Plaintiff that is not expressly
26 authorized by the agreement creating the debt (§ 1692f(1));
27 Defendant has attempted to collect on an alleged debt that
28 has not been established or proven and Defendant has
inflated the alleged debt improperly. On a debt was
originally only \$3400, Defendant has sought to collect

1 nearly \$10,000. Plaintiff contests that this debt exists
2 because she paid it in full under the terms of her original
3 lease and Defendant attempted to collect on it dispute
4 Plaintiff's dispute;

5 7) Collecting an amount from Plaintiff that is not permitted by
6 law (§ 1692f(1)); Defendant has attempted to collect on an
7 alleged debt that has not been established or proven and
8 Defendant has inflated the alleged debt improperly. On a
9 debt was originally only \$3400, Defendant has sought to
10 collect nearly \$10,000. Plaintiff contests that this debt
11 exists because she paid it in full under the terms of her
12 original lease and Defendant attempted to collect on it
13 dispute Plaintiff's dispute;

14 8) Threatening to take an action against Plaintiff that cannot
15 be legally taken or that was not actually intended to be
16 taken (§1692e(5));

17 9) Threatening Plaintiff that nonpayment of Plaintiff's debt
18 may result in the arrest of Plaintiff or the seizure,
19 garnishment, attachment or sale of any property or the
20 garnishment or attachment of wages of Plaintiff, where
21 such action was not in fact contemplated by the debt
22 collector and permitted by the law (Cal Civ Code
23 §1788.10(e));

24 10) Communicating with Plaintiff after having received a
25 letter from Plaintiff with a request to cease and desist all
26 collection contacts or a statement that Plaintiff refuses to
27 pay the debt (§1692c(c)); Plaintiff sent a letter on August
28 15, 2009, informing Defendant's principal that she did not
owe the debt in question and her attorneys' name
requesting no further contact to Plaintiff. Defendant has

1 sent multiple communications directly to Plaintiff since
2 that letter;

3
4 11) Communicating with Plaintiff at times or places which
5 were known or should have been known to be inconvenient
6 for Plaintiff (§1692c(a)(1));

7
8 12) Where Defendant had not yet made an attempt to
9 contact Plaintiff's counsel or had not given Plaintiff's
10 counsel sufficient time to respond to the initial attempt to
11 communicate with Plaintiff's counsel, and where Plaintiff's
12 counsel had not given Defendant permission to contact
13 Plaintiff directly, communicating with Plaintiff directly
14 after learning that Plaintiff is being represented by counsel
15 (§1692c(a)(2));

16
17 13) Repeatedly contacting Plaintiff at his/her place of
18 employment after being informed that such calls are
19 inconvenient to Plaintiff and violate the policy of
20 Plaintiff's employer (§ 1692c(a)(1)(3)); and

21
22 14) Threatening that the failure by Plaintiff to pay
23 Plaintiff's consumer debt will result in an accusation that
24 Plaintiff had committed a crime, where such accusation is
25 false (Cal Civ Code § 1788.10(b)).

26
27 6. Defendant's aforementioned violations of the FDCPA and RFDCPA
28 also constitute an intentional intrusion into Plaintiff's private places and into
private matters of Plaintiff's life, conducted in a manner highly offensive to a
reasonable person. Plaintiff had a subjective expectation of privacy that was
objectively reasonable under the circumstances.

1 7. Defendant's aforementioned disclosure of facts regarding Plaintiff's
2 debt to third parties constitutes a public disclosure of a private fact not of
3 legitimate public concern. Defendant's disclosures were highly offensive to a
4 reasonable person.
5

6
7 8. As a result of the above violations of the FDCPA, RFDCPA and
8 invasion of privacy, Plaintiff suffered and continues to suffer injury to Plaintiff's
9 feelings, personal humiliation, embarrassment, mental anguish and emotional
10 distress, and Defendant is liable to Plaintiff for Plaintiff's actual damages,
11 statutory damages, and costs and attorney's fees.
12

13
14 **COUNT I: VIOLATION OF FAIR DEBT**
15 **COLLECTION PRACTICES ACT**

16 9. Plaintiff reincorporates by reference all of the preceding paragraphs.
17

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff respectfully prays that judgment be entered
20 against the Defendant for the following:
21

- 22 A. Declaratory judgment that Defendant's conduct
23 violated the FDCPA;
24 B. Actual damages;
25 C. Statutory damages;
26 D. Costs and reasonable attorney's fees; and,
27 E. For such other and further relief as may be just and proper.
28

**COUNT II: VIOLATION OF ROSENTHAL
FAIR DEBT COLLECTION PRACTICES ACT**

10. Plaintiff reincorporates by reference all of the preceding paragraphs.

11. To the extent that Defendant's actions, counted above, violated the RFDCPA, those actions were done knowingly and willfully

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant for the following:

- A. Declaratory judgment that Defendant's conduct violated the RFDCPA;
- B. Actual damages;
- C. Statutory damages for willful and negligent violations;
- D. Costs and reasonable attorney's fees,
- E. For such other and further relief as may be just and proper.

**COUNT III: COMMON LAW INVASION OF PRIVACY BY INTRUSION
AND INVASION OF PRIVACY BY PUBLICATION OF PRIVATE FACTS**

12. Plaintiff reincorporates by reference all of the preceding paragraphs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant for the following:

- A. Actual damages
- B. Punitive Damages; and,

1 C. For such other and further relief as may be just and proper.
2
3

4 **PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**

5 Respectfully submitted this 9th day of April, 2010.
6

7
8 By: 

9 **TODD M. FRIEDMAN (216752)**
10 **LAW OFFICES OF TODD M.**
11 **FRIEDMAN, P.C.**

12 **369 S. Doheny Dr. #415**

13 **Beverly Hills, CA 90211**

14 **Phone: 877 206-4741**

15 **Fax: 866 633-0228**

16 **tfriedman@attorneysforconsumers.com**

17 **Attorney for Plaintiff**
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Manuel Real and the assigned discovery Magistrate Judge is Charles Eick.

The case number on all documents filed with the Court should read as follows:

CV10- 2693 R (Ex)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Todd M. Friedman, Esq.
 Law Offices of Todd M. Friedman, P.C.
 369 S. Doheny Dr., #415
 Beverly Hills, CA 90211

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

NIKKI GIAVASIS

CASE NUMBER

PLAINTIFF(S)

CV 10-02693 R (Ex)

v.

KIMBALL TIREY & ST. JOHN LLC.

SUMMONS

DEFENDANT(S).

TO: DEFENDANT(S): Kimball Tirey & St. John LLC 5994 W. Las Positas Blvd. Ste. 219 Pleasanton, CA 94588

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Todd M. Friedman, whose address is Law Offices of Todd M. Friedman, 369 S. Doheny Dr., #415, Beverly Hills, CA 90211. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 04-14-2010

By: Shirley Hursey
 Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)
 NIKKI GIAVASIS

DEFENDANTS
 KIMBALL TIREY & ST. JOHN LLC.

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

Todd M. Friedman, Esq., Law Offices of Todd M. Friedman, P.C.
 369 S. Doheny Dr., #415, Beverly Hills, CA 90211

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
 (Place an X in one box for plaintiff and one for defendant.)

Citizen of This State	PTF <input type="checkbox"/> 1 DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4 DEF <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2 <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3 <input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

☐ **MONEY DEMANDED IN COMPLAINT:** \$

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 15 USC 1692 Violation of the Fair Debt Collection Practices Act

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number:

CV 10-02693

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Alameda	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____ **Date** April 9, 2010

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))